

**EXHIBIT A**

State of Illinois                     )  
  ) ss  
County of St. Clair                )

**UNSWORN DECLARATION UNDER PENALTY OF PERJURY  
IN SUPPORT OF COMPLAINT FOR FORFEITURE**

I, Winfred Strickland, declare under penalty of perjury the following:

At all relevant times, I have been a Special Agent (SA) with the Drug Enforcement Administration (DEA). The contents of this Declaration are based on information provided to me during the course of my investigation from participants in the criminal activity, from other witnesses, and from other law enforcement officers.

1. On January 31, 2023, agents with the DEA arrested Patrick BURTON in the driveway of his residence located in Granite City, Madison County, Illinois. Agents then executed a federal search warrant and made entry into the residence, securing BURTON's girlfriend, Tammy WARE.

2. As a result of the search of the residence the following were located and seized:

- a. 2.15 kilograms of suspected cocaine labeled "W55" located in a teal Air Jordan backpack inside of the garage hidden within un-rimmed tires.
- b. 227.7 grams of suspected cocaine located 4 clear plastic baggies containing cocaine in the middle bedroom closet within a blue tote.
- c. 30.0 grams of suspected cocaine located in a small clear plastic bag containing a hard white substance believed to be cocaine found in the laundry room within a purse containing items belonging to WARE.
- d. \$260.00 in United States currency Official Advanced Funds (OAF) located on the master bedroom night stand.
- e. A total of \$3,520.00 in United States currency located in the master bedroom within a shoe box and on a night stand (without drawers).
- f. \$490.00 in United States currency located on the master bedroom night stand, and \$9,550.00 USC located within the master bedroom closet within a shoe box.

3. While agents were searching the residence, Special Agent Ryan Bandy (SA Bandy) and Task Force Office Gregory Hosp (TFO Hosp) conducted audio interviews with BURTON and WARE.

4. TFO Hosp advised BURTON of his Miranda Rights via a DEA-13A card and BURTON said he understood his rights. BURTON complained about having to use the bathroom and was given an opportunity to relieve himself. BURTON asked if agents had a "sale" on him (controlled purchase of narcotics). TFO Hosp confirmed purchases of cocaine had been made from BURTON.

5. TFO Hosp asked BURTON what was going to be found in the house. BURTON initially stated nothing, but then stated there was 2.5 ounces (cocaine) inside the residence. TFO Hosp inquired about money being in the house and BURTON stated he believed there was approximately \$4,500.00.

6. TFO Hosp questioned BURTON about 15<sup>th</sup> Street and Gaty Ave. It should be noted during surveillances of BURTON, agents observed numerous drug transactions occurring in that area. BURTON admitted there were drug sales occurring at that location. TFO Hosp asked BURTON if he was supplying anyone with narcotics at that location. BURTON initially attempted to evade the question, but confirmed he was supplying two individuals. TFO Hosp asked BURTON how much he was supplying and BURTON advised a couple ounces at a time.

7. TFO Hosp inquired further to whom BURTON was supplying (cocaine) and BURTON paused and asked if he could have an attorney with him before he answered any more questions. TFO Hosp confirmed BURTON could have representation and all direct questions regarding BURTON's drug activities were stopped.

8. TFO Hosp went inside of the residence and asked WARE to come outside and speak with BURTON. WARE was escorted outside and was told by BURTON to not tell anyone about the warrant execution. WARE agreed and was taken back inside by TFO Hosp.

9. TFO Hosp then conducted an interview with WARE, as witnessed by SA Julie Olmstead. TFO Hosp advised WARE of her Miranda Rights via a DEA-13A card and WARE acknowledged she understood her rights. WARE agreed to answer questions.

10. TFO Hosp asked WARE how long she has been in a relationship with BURTON. WARE said they met on social media about 1.5 years ago. WARE stated BURTON has been living at the Granite City residence for the last 30 days.

11. WARE said BURTON previously worked for Bi-State but lost the job in late November or early December. TFO Hosp asked WARE what in the residence was BURTON's. WARE stated if drugs were found then they belonged to BURTON. WARE denied having any knowledge of BURTON selling drugs.

12. TFO Hosp asked WARE about any large amount of money being in the residence and about BURTON being in possession of large amounts of currency. WARE has previously seen BURTON with between \$5,000.00 to \$10,000.00. WARE said she warned BURTON about having that type of money on him since he's "flashy" about it and is worried he will get robbed.

13. TFO Hosp inquired about friends/acquaintances BURTON might have brought to the house. WARE said a young male (B/M, thin, young age, long dreads) had come over before and sold her quarter grams of marijuana.

14. TFO Hosp asked WARE about an earlier statement she made about having between \$11,000.00 and \$13,000.00 in United States currency in the house. WARE stated it was in the closet, stuck in a shoe box hidden inside of the shoe. WARE claimed the money was earned by her and it was set back to pay for her son's attorney.

15. SA Olmstead asked WARE if she had seen a teal backpack. WARE said she had seen it

before in the trunk of BURTON's vehicle. (Agents seized 2.15 kilograms of suspected cocaine from the teal backpack).

16. The interview was terminated shortly thereafter. WARE was released on scene and the residence was turned over to her without further incident.

17. Agents reviewed the seized money in attempt to find OAF that was used in previous controlled purchases from BURTON. TFO Hosp and SA Bandy located \$260.00 OAF.

18. The recovered OAF was from a controlled purchase of cocaine from BURTON on January 24, 2023.

19. TFO Gregory Degener (TFO Degener) utilized his K-9 partner "Blu" to conduct four individual open air sniffs of the four sums of currency that were seized from BURTON and WARE's residence. TFO Degener advised "Blu" gave a positive alert for the odor of narcotics during all four open-air sniffs.

20. Official counts of the seized United States currency were conducted. The amounts totaled:

- a. A total of \$3,520.00 in United States currency located in the master bedroom within a shoe box and on a night stand (without drawers).
- b. A total of \$10,040.00 in United States currency located within the master bedroom closet within a shoe box and on the master bedroom night stand.

21. On April 23, 2023, Tammy WARE filed an administrative claim for \$10,040.00 in United States currency.

22. Based on the foregoing, declarant believes that the \$10,040.00 in United States Currency is property which constitutes money furnished or intended to be furnished by a person in exchange for a controlled substance, or proceeds traceable to such an exchange, or money used to facilitate a violation of 21 U.S.C. Section 801 *et seq.*

Pursuant to 28 U.S.C. Section 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 20th day of July, 2023.

SA W. Strickland  
WINFRED STRICKLAND  
Special Agent  
Drug Enforcement Administration